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FILED
 CLERK, U.S. DISTRICT COURT

OCT 19 1998

7 Attorneys for Plaintiff
 8 United States of America

9 UNITED STATES DISTRICT COURT

10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,)	No. CR 93-561
)	
12 Plaintiff,)	<u>GOVERNMENT'S EX PARTE</u>
)	<u>APPLICATION FOR ORDER</u>
13 v.)	<u>UNSEALING INDICTMENT AND</u>
)	<u>ARREST WARRANTS; DECLARATION</u>
14 SALIM MORDOK,)	<u>OF JOHN S. GORDON; PROPOSED</u>
15 JOSEF MORDOK,)	<u>ORDER</u>
)	
16 Defendants.)	

17 Plaintiff United States of America, through its counsel of
 18 record, Assistant United States Attorney John S. Gordon, hereby
 19 applies to the court for an order unsealing the indictment and
 20 arrest warrants in No. CR 93-561, which were sealed pursuant to
 21 Rule 6(e)(4) of the Federal Rules of Criminal Procedure. This
 22 application is based on the attached declaration of John S.
 23 Gordon and all the files and records in the case. The government
 24 seeks unsealing of the indictment and arrest warrants in the
 25 above-titled case because one of the defendants, Josef Mordok,
 26 has been arrested in Costa Rica, and the government needs to
 27 initiate extradition proceedings against him, which will require
 28 submission of the indictment and arrest warrant for him, among

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 6

1 other documents. The government seeks unsealing of the arrest
2 warrant for Salim Mordok so that in the event he is ultimately
3 apprehended, the government will be able to submit in extradition
4 proceedings a copy of that warrant, among other documents.

5 DATED: October 15, 1998.

6 Respectfully submitted,

7 NORA M. MANELLA
United States Attorney

8 DAVID C. SCHEPER
9 Assistant United States Attorney
Chief, Criminal Division

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11 JOHN S. GORDON
12 Assistant United States Attorney
Chief, Narcotics Section

13 Attorneys for Plaintiff
14 United States of America
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1 DECLARATION OF JOHN S. GORDON

2 I, JOHN S. GORDON, do hereby declare:

3 1. I am an Assistant United States Attorney and Chief of the
4 Narcotics Section in the United States Attorney's Office for the
5 Central District of California. I am supervising the prosecution
6 of United States v. Salim Mordok and Josef Mordok, No. CR 93-561.
7 According to the government's records, on June 17, 1993, a 16-
8 count indictment was returned by the federal grand jury charging
9 defendants Salim and Josef Mordok with conspiracy to aid and abet
10 the distribution of cocaine and launder monetary instruments and
11 laundering monetary instruments; the indictment and arrest
12 warrants were filed under seal.

13 2. On October 13, 1998, I was informed by an agent of the
14 Drug Enforcement Administration and by an attorney in the
15 Department of Justice's Office of International Affairs that
16 Josef Mordok had been arrested earlier that day in Costa Rica.

17 3. My office wishes to initiate extradition proceedings

18 /

19 /

20 /

1 against Josef Mordok and needs to formally submit copies of the
2 indictment and arrest warrant in support of its extradition
3 request.

4 I declare under penalty of perjury that the foregoing is true
5 and correct to the best of my knowledge.

6 DATED: October 15, 1998.

7 

8 JOHN S. GORDON
9 Assistant United States Attorney
Chief, Narcotics Section

10 ~~PROPOSED~~ ORDER

11 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the
12 indictment and arrest warrants in No. CR 93-561 are unsealed for
13 further proceedings in this case.

14 SO ORDERED: October 19, 1998.

15 

16 UNITED STATES DISTRICT JUDGE

17
18 Presented by:

19 

20 JOHN S. GORDON
21 Assistant United States Attorney
Narcotics Section